REMARKS

With this response, claim 1 is amended, and claims 14-30 are withdrawn. New claims 31-34 have been added. No new matter is added.

Applicant respectfully traverses, with amendment, the rejection of claims 1-13 under 35 U.S.C. § 103(a) over U.S. Patent No. 6,956,848 ("Keung") in view of U.S. Publication No. 2004/0141596 ("Crockett") at page 3 of the Office Action.

Keung and Crockett fail to disclose or suggest a motivation to make the asserted combination. Keung discloses a centralized switching system for connecting a caller to a centralized auto-attendant. *See Keung*, Col. 13, lines 13-15. Additionally, Keung discloses that multiple instances of the auto-attendant systems may be located on a particular destination telecommunication system. *See Keung*, Column 13, lines 59-61. Additionally, Keung discloses that auto-attendant requests from different systems may be routed to the appropriate instance of the auto-attendant on the destination system. *See Keung*, col. 13, lines 61-63. Crockett discloses a system that provides enhanced Advanced Intelligent Network (AIN) call services using a voice extensible markup language (VXML) server to enable communication between a calling party and the public switched telephone network. *See Crockett*, p. 2, paragraph 0072. Crockett also discloses that the VXML platform is programmed. *See Crockett*, p. 5, paragraph 0092. Keung and Crockett fail to disclose or suggest a motivation for combining the AIN services of Crockett into the selectable auto-attendant instances of Keung. Therefore, the combination of Keung and Crockett is improper and should be withdrawn.

Additionally, even if Keung and Crockett are combined, the asserted combination fails to disclose or suggest a network based voice activated auto-attendant system that includes a data connector to receive data from a remote enterprise information system and to process the received data for use by the enterprise voice directory, and to receive data and to processing the data from the enterprise voice directory to construct grammars in a database of voice directory grammars, as recited in independent claim 1.

The Office Action on page 3 admits that Keung does not disclose or teach receiving data from a remote system and then processing the data for use by a voice directory and a database of

voice directory grammars. The Office Action alleges that Crockett discloses this element and that the combination of Crockett and Keung allegedly discloses all of the elements of claim 1.

The AIN telecommunication system in Crockett includes a subscriber database 28 that interfaces with the Service Control Point 23 through a compatible protocol such as a generic data interface (GDI) or common object request broker architecture (CORBA). *See Crockett*, p. 4, paragraph 0089. Information in the database 28 is used by the Service Control Point 23 to ascertain whether a particular subscriber should have access to a particular Advanced Intelligent Network. *See Crockett*, p. 4, paragraph 0089. Nowhere does Crockett disclose or suggest receiving and processing data from an enterprise voice directory to construct grammars in a database of voice directory grammars, as recited by claim 1. The database 28 in Crockett is used to store information about subscribers (*See Crockett*, p. 4, paragraph 0089) and is not described as receiving grammars as recited in claim 1.

Crockett does discuss modifying information in the database 28. *See Crockett*, p. 14, paragraph 0163. However, the updates to database 28 are not generated by data from an enterprise voice directory. Additionally, the database 28 is not disclosed as containing voice directory grammars. As such, even if one having ordinary skill in the art were motivated to modify the system of Keung to incorporate the service control point (SCP) 23 of Crockett, the resulting system would lack the data connector as provided in claim 1. The asserted combination of Keung and Crocket fails to disclose or suggest a network based voice activated auto-attendant system that includes a data connector to receive data from a remote enterprise information system and to process the received data for use by the enterprise voice directory, and to receive data and to processing the data from the enterprise voice directory to construct grammars in a database of voice directory grammars, as recited in independent claim 1. Accordingly, Applicant respectfully submits that a *prima facie* case of obviousness does not exist as the combination of references fails to disclose each of the claim elements of independent claim 1.

Since independent claim 1 is allowable, each of the dependent claims from claim 1 is likewise allowable, at least by virtue of their dependency from independent claim 1. In addition, the dependent claims include further features not found in the cited references. For example, claim 11 recites a network based voice activated auto-attendant system wherein a second data

connector is coupled to the remote enterprise information system and wherein the second connector is remotely located with respect to the data connector. No such second data connector can be found associated with the subscriber database 28 in Crockett or the system of Keung. Accordingly, the rejection of claims 2-13 should be withdrawn. Also, new claims 31-34 are likewise allowable.

As an example, claim 31 recites a network based voice activated auto-attendant system wherein a second data connector is coupled to the remote enterprise information system and wherein the second data connector is selected based on the type of data in an enterprise information data source that is included in the remote enterprise information system, wherein the second data connector is used to convert data to a format compatible with the voice activated auto-attendant service provider network. Keung teaches sending compatible data from one telecommunication system to another and employs auto-attendant systems that do not access customer databases. *See Keung*, Column 15, lines 1-13; and Column 18, lines 11-14. Nowhere does Crockett disclose accessing data from an enterprise information system data source that is initially incompatible with the auto-attendant network. Crockett does not suggest going beyond the subscriber database 28 to access data from a system that may be initially incompatible with the auto-attendant network. Therefore, the combination of Crockett into Keung fails to disclose or suggest at least one element of claim 31.

The cited references, alone or in combination, fail to disclose or suggest each of the elements of claims 1-13 and of claims 31-34. Accordingly, Applicant respectfully requests reconsideration and withdrawal of all pending rejections.

Applicant respectfully submits that the present application is in condition for allowance. Accordingly, the Examiner is requested to issue a Notice of Allowance for all pending claims. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

The Commissioner is hereby authorized to charge any fees that may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date

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